

1 **JENNY L. FOLEY, Ph.D., ESQ.**

Nevada Bar No. 9017

2 E-mail: jfoley@hkm.com

MARTA D. KURSHUMOVA, ESQ.

3 Nevada Bar No. 14728

E-mail: mkurshumova@hkm.com

4 **DANA SNIEGOCKI, ESQ.**

Nevada Bar No. 11715

5 E-mail: dsniegocki@hkm.com

HKM EMPLOYMENT ATTORNEYS LLP

6 1785 East Sahara, Suite 300

Las Vegas, Nevada 89104

7 Tel: (702) 805-8340

Fax: (702) 920-8112

8 *Attorneys for Plaintiff*

9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 BRETT WAGGONER, an Individual,

12 Plaintiff,

13 vs.

14 NYE COUNTY, CHRIS ARABIA, in his
15 individual and official capacity; LEO
16 BLUNDO, in his individual and official
17 capacity; DOES 1-X, ROE
18 CORPORATIONS 1-X,

19 Defendants.

CASE NO.: 2:20-cv-01044

**STIPULATION AND ORDER FOR 60
DAY STAY OF DISCOVERY**

(FIRST REQUEST)

20 The parties, Plaintiff, BRETT WAGGONER, ("Plaintiff" or "Mr. Waggoner" and
21 Defendant, NYE COUNTY, ("Defendant Nye") and Defendants, CHRIS ARABIA and LEO
22 BLUNDO, (collectively "Defendants Arabia & Blundo"), by and through their respective
23 attorneys of record, hereby stipulate and agree as follows:

24 1. That the case be stayed for 60 days because Counsel for Plaintiff will be making
a motion to withdraw as counsel for Plaintiff. It is anticipated that the Motion to withdraw will
be filed the same day as this stipulation.

2. The brief stay is intended to give Plaintiff time to find other counsel and for Plaintiff's new counsel to familiarize themselves with the case.

3. This matter is in its infancy, and the parties request that in addition to the stay, that the Early Neutral Evaluation, currently set for September 25, 2020 also be continued by approximately sixty days.

Dated: August 6, 2020

Dated: August 6, 2020

LEMONS, GRUNDY & EISENBERG

MARQUIS AURBACH COFFING

By: /s/ Rebecca Bruch
REBECCA BRUCH, ESQ.
Nevada Bar No. 7289
6005 Plumas Street, Third Floor
Reno, Nevada 89519
Telephone: (775) 786-6868
Email: rb@lge.net
Attorneys for Defendant Nye County

By: /s/ Brian R. Hardy
CRAIG R. ANDERSON, ESQ.
Nevada Bar No. 6882
Email: canderson@maclaw.com
BRIAN R. HARDY, ESQ.
Nevada Bar No. 10068
Email: bhardy@maclaw.com
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
Attorneys for Defendants Chris Arabia and Leo Blundo

IT IS ORDERED that ECF No. 13 is GRANTED in part and DENIED in part. It is granted to the extent that the Court will stay discovery and the deadline to file a proposed discovery plan and scheduling order until October 20, 2020. It is denied in all other respects. To the extent the parties would like the Early Neutral Evaluation continued, they must file a separate motion or stipulation seeking this relief, as Judge Youchah will decide this request.

IT IS SO ORDERED

DATED: August 11, 2020



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

1 Dated: August 6, 2020

2 HKM EMPLOYMENT ATTORNEYS
3 LLP

4 By: /s/ Jenny L. Foley
JENNY L. FOLEY, Ph.D., ESQ.
5 Nevada Bar No. 9017
E-mail: jfoley@hkm.com
6 MARTA D. KURSHUMOVA, ESQ.
Nevada Bar No. 14728
7 E-mail: mkurshumova@hkm.com
DANA SNIEGOCKI, ESQ.
8 Nevada Bar No. 11715
E-mail: dsniegocki@hkm.com
9 1785 East Sahara, Suite 300
Las Vegas, Nevada 89104
10 Telephone: (702) 805-8340
Facsimile: (702) 920-8112
11 *Attorneys for Plaintiff*